

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

<b>IN RE:</b>	) <b>Case No.</b> 21-21338-CMB
Denise M. Campbell	)
<b>Debtor,</b>	) <b>Chapter 13</b>
Denise M. Campbell	)
<b>Movant,</b>	) <b>Related Document No.</b> 97-145
<b>vs.</b>	) <b>Hearing Date:</b> 01/09/24 @ 1:30 p.m.
Ronda J. Winnecour, Chapter 13 Trustee,	) <b>Response Due:</b> 12/12/23
<b>Respondent.</b>	) <b>Document No.</b>

**RESPONSE TO TRUSTEE'S MOTION (1) PROCESS CAPITAL ONE REFUND, (2) AUTHORIZE DISTRIBUTION OF LUMP SUM BALANCE TO IRS, AND (3) DISMISS BANKRUPTCY CASE**

**AND NOW**, comes the Debtor, Denise M. Campbell, by and through her counsel, Donald R. Calaiaro and Calaiaro Valencik, and files this Response to the Trustee's Motion (1) Process Capital One Refund, (2) Authorize Distribution of Lump Sum Balance to IRS, and (3) Dismiss Bankruptcy Case, and in support thereof states as follows:

1. This case was filed on June 4, 2021 under Chapter 13 of the United States Bankruptcy Code.
2. The Trustee filed a motion to distribute the remaining funds of the case and requested for dismissal.
3. The Debtor has reviewed the matter and has decided to agree to the Dismissal.
4. The Debtor is unable to make her monthly payments and any increase to her plan payments to cure the arrears would not be feasible.
5. The Debtor requests that her case be dismissed without prejudice.

**WHEREFORE**, the Debtor consents to the dismissal of her Chapter 13 Bankruptcy

without prejudice.

**Respectfully submitted,**

Date: December 12, 2023

/s/ Donald R. Calaiaro

**Donald R. Calaiaro**

**PA ID 27538**

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